

1 David R. Ongaro (State Bar No. 154698)  
dongaro@ongaropc.com  
2 Kirsten McNelly Bibbes (State Bar No. 276308)  
kbibbes@ongaropc.com  
3 Nilufar K. Majd (State Bar No. 246017)  
nmajd@ongaropc.com  
4 ONGARO PC  
1604 Union Street  
5 San Francisco, CA 94123  
Telephone: (415) 433-3900  
6 Facsimile: (415) 433-3950

7 Attorneys for Defendant  
HONEYWELL INTERNATIONAL INC., *f/k/a*  
8 AlliedSignal Inc., Successor-In-Interest To  
The Bendix Corporation  
9

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12

13 *In re Toy Asbestos Litigation*

Case No. 4:19-cv-00325-HSG

14 **STIPULATION AND ~~PROPOSED~~**  
15 **ORDER FOR MODIFIED DEPOSITION**  
16 **AND *DAUBERT* SCHEDULE**  
17 **REGARDING DEFENDANT**  
18 **HONEYWELL INTERNATIONAL**  
19 **INC.'S EXPERT DR. ANIL VACHANI**

Trial Date: July 27, 2020  
Date Removed: January 18, 2019

21 Pursuant to the Court's Order Granting in Part and Denying in Part, Defendant Honeywell  
22 International Inc.'s ("Honeywell") Motion to Modify the April 27, 2020 Court Ordered Deadline  
23 to Depose Expert Dr. Anil Vachani (ECF Docket No. 507), Plaintiffs Agnes Toy and Thomas Toy,  
24 Jr. ("Plaintiffs") by and through their attorneys of record, and Honeywell by and through its  
25 attorneys of record, have met and conferred and submit the following Stipulation and Proposed  
26 Order for the deposition of, and *Daubert* schedule pertaining to Dr. Anil Vachani.  
27  
28

| Matter  | Parties Proposed New Date:      |
|---|---------------------------------|
| Deposition of Dr. Vachani   | June 1, 2020 at 10:00 a.m. (ET) |
| <i>Daubert</i> Motion Filing Deadline Regarding Dr. Vachani           | June 11, 2020                   |
| Honeywell's Opposition to <i>Daubert</i> Motion Regarding Dr. Vachani | June 18, 2020                   |
| Plaintiffs' Reply to <i>Daubert</i> Motion Regarding Dr. Vachani      | June 25, 2020                   |
| <i>Daubert</i> Hearing Regarding Dr. Anil Vachani                     | July 2, 2020 at 2:00 p.m.       |

Dated: May 29, 2020

**Dean, Omar, Branham, Shirley, LLP**

By: /S/ Benjamin Adams  
 BENJAMIN ADAMS  
 Attorneys for Plaintiffs  
 Agnes Toy and Thomas Toy, Jr.

Dated: May 29, 2020

**ONGARO PC**

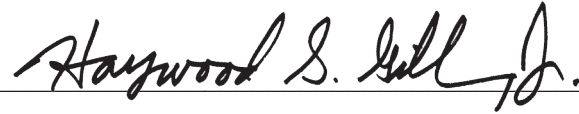
By: /S/ Nilufar K. Majd  
 NILUFAR K. MAJD  
 Attorneys for Defendant  
 HONEYWELL INTERNATIONAL INC. *f/k/a*  
 AlliedSignal Inc., Successor-in-Interest to The  
 Bendix Corporation

**~~PROPOSED~~ ORDER**

PURSANT TO STIPULATION between the parties, it is hereby ORDERED that the January 10, 2020 case schedule is modified as shown above and that Plaintiffs and Honeywell shall comply with the modified schedule listed above.

6/1/2020

**DATE**



**HON. HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT COURT JUDGE**